

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANDREW HEDDEN, et al.,

NO. C05-0999 TSZ

Plaintiffs,

NOTICE OF DEPOSITION AND
SUBPOENA DUCES TECUM TO
CHRISTOPHER KONKEL

v.

CITY OF SEATTLE, et al.,

Defendants.

To: Christopher Konkell
c/o Paul Richmond
Law Office of Paul Richmond
600 First Avenue, Suite 331
Seattle, WA 98104

YOU ARE HEREBY COMMANDED to be and appear at the offices of STAFFORD
FREY COOPER, 3100 Two Union Square, 601 Union Street, Seattle, Washington 98101
on Tuesday, November 14, 2006, at 1:30 p.m., then and there to give testimony upon oral
examination at the request of the defendants in the above-entitled cause, and to remain in
attendance upon the undersigned or other Notary Public until discharged.

YOU ARE FURTHER COMMANDED to bring with you at said time and place the
following documents or tangible things:

NOTICE OF DEPOSITION AND SUBPOENA DUCES
TECUM TO CHRISTOPHER KONKEL- 1

C05-0999 TSZ
3019-027230 121162

STAFFORD FREY COOPER

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885

1. All diaries, documents, e-mails, and written notes that reflect your *observations* of the demonstration events.¹
2. All photographs, audio recordings, video recordings, or other media taken by you of the demonstration events.
3. A copy of the flyers you handed out during the demonstration.
4. All evidence gathered at the scene of the demonstration, including but not limited to physical evidence of "non-lethal" weaponry.
5. All documents, materials, and/or written communications exchanged between you and the plaintiffs or other demonstrators before and during the demonstration.
6. All documents related to the permitting process for the demonstration.

HEREIN FAIL NOT AT YOUR PERIL.

DATED this 7th day of November, 2006.

STAFFORD FREY COOPER

By: /s/ Darrin E. Bailey via ECF
Ted Buck, WSBA #22029
Krista S. Mirhoseini, WSBA #22134
Darrin E. Bailey, WSBA #34955
Attorneys for Defendant City of Seattle
Stafford Frey Cooper
601 Union Street, Suite 3100
Seattle, WA 98101-1374
Phone: 206-623-9900
Fax: 206-624-6885
TBuck@StaffordFrey.com
KMirhoseini@StaffordFrey.com
DBailey@StaffordFrey.com

¹ Demonstration refers to the demonstration that occurred in Seattle, Washington on June 2, 2003, as referenced in your Complaint.

Certificate of Service

I certify that on the date noted below I electronically filed this document entitled Notice of Deposition and Subpoena Duces Tecum to Christopher Konkell with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Kristofer J. Bundy, 19840
kris.bundy@metrokc.gov
King County Prosecuting Attorney's Office
900 King County Administration Bldg.
500 Fourth Avenue
Seattle, WA 98104
(206) 296-9058
FAX: (206) 296-8819
*Attorneys for Defendant King
County Sheriff's Office*

Paul Richmond, 32306
Law Office of Paul Richmond
600 First Avenue, Suite 331
Seattle, WA 98104
(206) 382-6275
FAX: (206) 382-4941
Attorneys for Plaintiffs

Lawrence A. Hildes
lhildes@earthlink.net
Law Offices of Lawrence A. Hildes
PO Box 5405
Bellingham, WA 98227
(360) 715-9788
FAX: (360) 714-1791
Attorneys for Plaintiffs

Robert Steven Puz, 17407
stevep@atg.wa.gov
Robert Steven Puz, 17407
Office of the Attorney General
629 Woodland Square Loop SE
Olympia, WA 98504-0126
(360) 438-7316
FAX: (360) 459-6967
*Attorneys for Defendants Cliff Pratt
and Jane Doe Pratt*

Zanetta L. Fontes
Warren Barber & Fontes
100 South Second Street
PO Box 626
Renton, WA 98057
(425) 255-8678
FAX: (425) 255-5474
*Attorneys for Defendant Renton
Police Department*

DATED this 7th day of November, 2006, at Seattle, Washington.

STAFFORD FREY COOPER

By: /s/ Darrin E. Bailey via ECF
Darrin E. Bailey, WSBA #34955
Attorneys for Defendant
Stafford Frey Cooper
601 Union Street, Suite 3100
Seattle, WA 98101-1374
Phone: 206-623-9900
Fax: 206-624-6885
DBailey@StaffordFrey.com

NOTICE OF DEPOSITION AND SUBPOENA DUCES
TECUM TO CHRISTOPHER KONKEL- 3

C05-0999 TSZ
3019-027230 121162

STAFFORD FREY COOPER

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885